CLI Update #3

CONSUMER LABELING INITIATIVE (CLI):

Phase II Heads Toward the Finish Line!

his Update provides some details about what the different CLI Subgroups have been doing in recent months. The detailed findings and recommendations from Phase II of the CLI will be published in the CLI Phase II Report, which will be available to anyone who is interested. (See the end of this Update for information on how to obtain copies of documents or contact particular EPA Project Leads.)

Consumer Research

Quantitative Consumer Research

As we mentioned in the last Update, the CLI Partners hired a national, independent market research and polling firm to conduct a quantitative consumer opinion survey. The survey included questions designed to elicit information on how easily consumers can find label information, how well they understand the information, when and where they consult the labels, the relative importance of different kinds of label information, and which information they wish to be able to find most quickly. The study design incorporated input from experienced researchers, industry, EPA, the Consumer Product Safety Commission, the Food and Drug Administration, and other stakeholders.

The phone and mail quantitative study was conducted in April through June of this year. The data obtained are currently being reviewed. The results and recommendations from the surveys will be presented in the Phase II Report. A summary of the data and recommendations resulting from the survey will be presented in the Phase II Report.

Opportunities for Stakeholder Input

The CLI welcomes input from interested stakeholders at any point in the process. Below are some current milestones at which feedback is especially welcome.

- √ Review the research and proposed strategy for the consumer education campaign late August-September 1998.
- √ Provide input to CLI Phase
 II recommendations late
 August-September 1998. If
 you'd like to send
 comments or information,
 see the Update section
 entitled "How Can I Find
 out More?"
- √ Attend the CLI Partners
 and Task Force meeting in
 the Washington, DC area –
 September 23-24, 1998.
 For more information, get
 in touch with Nicole
 Christian (see box at
 bottom of p5 for contact
 information).
- √ Review and comment on the CLI Phase II Report – September-October 1998.

Qualitative Consumer Research

A qualitative study was conducted during July and August to investigate consumers' ideas about signal words, the logo for the *Read the Label First!* campaign, and what types and formats of standardized environmental information on labels would be best received by consumers. The data were collected through a series of mini-focus groups in Ft. Lauderlale, Chicago, and Dallas during the summer. (The focus groups are discussed briefly under the following section, "Standardized Environmental Information on Product Labels.") Again, detailed findings and recommendations will appear in the Phase II Report.

Standardized Environmental Information on Product Labels

Both the quantitative and qualitative consumer research components of the CLI have explored this area. The quantitative surveys all included questions about which of several formats of standard information the consumers preferred, and which format included information consumers wanted to see.

The mini-focus groups explored consumers' reactions to having a standardized label format. Consumers were also questioned about what information, signal words (e.g., Danger), symbols, colors, and placement of information they would prefer to see on labels.

The results of both the surveys and the focus groups will be discussed in the Phase II Report.

Storage and Disposal

Phase I research found that consumers often don't read storage and disposal instructions, that they frequently recycle non-recyclable pesticide containers, and that labeling instructions often conflict with state or locals laws or practices. The Subgroup tackled these issues in Phase II.

During recent months the CLI Storage and Disposal Subgroup members made progress on several fronts. They investigated storage and disposal practices and issues around the country by talking with EPA Regional Offices. The Subgroup met with representatives of the cleaning and indoor insecticide industry in May regarding the disposal of their products. Also, the Subgroup conducted research with state and

What is the CLI?

The CLI is a voluntary partnership between EPA, other government agencies, companies that make and distribute household hard surface cleaners, insecticides, and pesticides, and other stakeholders, including consumer groups. The CLI puts consumers' needs first—helping them to find, read, and understand label information, so they can compare household products, and so they can use these products safely and effectively.

The CLI focuses on labeling of indoor insecticides as well as outdoor house-and-garden pesticides (including ant and roach products, weedkillers), and household hard-surface cleaners (including cleaners for floors, basins, tubs, and tile).

The CLI got underway in early 1996. In Phase I, the CLI Partners researched ways to improve consumer package labels, solicited consumers' ideas for better labels, reviewed the existing literature of labeling research, and published a comprehensive research report and other information about the progress of the CLI.

In Phase II, the CLI Partners have taken a number of actions to help improve household labels from the consumer's point of view. Phase II activities have included the following: quantitative surveys, qualitative research (focus groups of consumers), research and policy analysis on storage and disposal information, consumer research to identify ingredient information that consumers might want on labels, revising first aid statements, a broad-based consumer education campaign aimed at encouraging people to read the label before they buy or use a product, and identifying and involving more stakeholders.

local government representatives to help understand current state and local regulations and practices regarding storage and disposal of household hazardous waste products.

The research confirmed that regulations, policies, and programs for disposal of products vary greatly, both among and within the states and localities. In most states, local governments regulate disposal of these types of wastes. And the majority of recycling programs are operated by municipal governments, which must coordinate with local waste hauling companies. Between them, companies and their local government decide what materials can and cannot be recycled. In many cases, market forces are the predominant factor determining what materials end up being recycled. If a recycling company can cost-effectively recycle a specific material, it will be more willing to collect it.

All of this variability makes it very challenging to develop standard language that fits everyone's circumstances. However, the subgroup continues to work on finding ways to improve storage and disposal statements on labels. The results of the quantitative and qualitative consumer research may have particular relevance in this task. Also, various consumer education strategies are being considered to increase awareness and use of proper storage and disposal practices.

Consumer Education

CLI's Consumer Education Subgroup has been working to help consumers to read and use labels; decrease the misuse of products; reduce the incidence of accidents involving products; and decrease environmental impacts caused by improper use, storage, and disposal. Toward this goal, the Subgroup is preparing to roll out a nationwide consumer education campaign. The campaign will include a logo and slogan, educational materials for use by all interested parties, and supporting strategic documents to help stakeholders implement the campaign effectively.

This spring, the Consumer Education Subgroup reviewed and commented on proposed *Read the Label First!* logo designs prepared pro bono by the Valentine-Radford Agency. Participants in this summer's qualitative research mini-groups (see the Qualitative Consumer Research section) were asked to identify which of the designs would be most likely to catch their eyes and encourage them to read labels. The final choice of logo will take this feedback into consideration.

CLI Partners and Task Force Members

CLI includes a Task Force of EPA and other federal and state government agencies, as well as Partners from industry and other stakeholder groups.

CLI Task Force Members:

California Department of Pesticide Regulation

Maryland Department of Agriculture Minnesota Pollution Control Agency University of Maine

U.S. Consumer Product Safety Commission

U.S. Environmental Protection Agency

U.S. Federal Trade Commission

U.S. Food and Drug Administration Vermont Agency of Natural Resources

CLI Partners:

Bayer Corporation

Bioserv Inc.

Chemical Specialty Manufacturers
Association

Clorox Company

Coalition for Truth in Environmental Marketing

Colgate-Palmolive Company

FMC Corp.

International Poison Center

Olin Corporation

Procter & Gamble

Reckitt & Colman

RISE® (Responsible Industry for a Sound Environment)

Rod Products Company

S.C. Johnson Wax, Inc.

The Solaris Group

United Industries

U.S. Chemical Producers and Distributors Association

EPA is planning to include the logo in brochures, posters, the CLI website, and public service advertisements. The materials are all being designed with maximum flexibility in mind, to allow any group to adapt them to whatever uses will work best. Users may customize the messages so they will be meaningful to different groups of consumers. Electronic and camera-ready versions of brochures, posters, and logos should be available this fall.

Organizations may adapt these educational support materials to any desired formats and colors—from black and white to high-quality color printing—with no need to obtain permission from the CLI first. Some creative uses for the logo could include bottle-top stickers, magazine and newspaper ad copy graphics, product labels, and packaging materials.

The Consumer Education Subgroup plans to begin distributing materials to pediatricians, veterinarians, the gardening community, and many general-interest consumer venues this fall, with the goal of initiating a well-publicized "push" next spring. The Subgroup also is considering identifying and approaching celebrities to become national spokespersons for the spring push.

First Aid Statements

Consumer feedback from Phase I research indicated that the words "Statement of Practical Treatment" were confusing. EPA adopted the CLI suggestion that manufacturers voluntarily replace this phrase with "First Aid."

In Phase II, the CLI First Aid Statements Subgroup has developed suggested changes in the wording of first aid statements, based on the comments received from the American Red Cross, the Consumer Product Safety Commission, the American Association of Poison Control Centers, the Communications Task Force of the Pesticide Program Dialogue Committee, and others.

These proposed revisions to First Aid instructions were distributed for review and comment to the American Red Cross, the American Association of Poison Control Centers, the Communications Task Force of the Pesticide Program Dialogue Committee, and the Consumer Product Safety Commission, as well as to CLI partners, subgroup members, and stakeholders. This fall, the final statements will be published in a Pesticide Regulation Notice, which the EPA website will post.

Reaching Consumers Using CLI *Read the Label First!* Materials

As a scenario of how the CLI consumer education materials could be used, let's say that a national consumer gardening association has just decided to add their logo and some information about their association on the poster design and print 5,000 colorful posters, which they will distribute to garden centers around the country. They also plan to make similar changes to the sample brochure, print it in the colors of the association, and send copies to all their local groups for use at meetings and other gatherings. They will also join with other gardening and environmental groups to publish a full-page Public Service Announcement in major consumer magazines. In all, this association can expect to reach up to about a million consumers with the Read the Label First! message.

Some Probable Avenues of Distribution for the *Read* the Label First! campaign:

- garden centers and other stores that sell these types of products
- gardening organizations
- pediatricians
- veterinarians
- consumer magazines
- newspapers
- television
- radio
- consumer Internet sites
- poison control centers
- manufacturers and distributors of consumer insecticides, pesticides, and cleaners
- consumer advocacy and safety organizations
- environmental organizations

Upcoming CLI Meeting!

The next CLI Partner and Task Force meeting will be held in the Washington, DC area on September 23-24, 1998. This meeting will focus on findings, conclusions and recommendations about Phase II of the CLI. If you would like information about the meeting, get in touch with any of the EPA CLI Contacts in the box at the bottom of this page.

Thank You All!

The CLI Partners, Task Force, and Subgroups would like to thank the many consumers, market researchers, local government agencies, public interest groups, and health and safety professionals who have shared their knowledge and views about labeling.



How Can You Find Out More?

1. You may obtain press releases and other public materials about the CLI Project through the EPA Press office. To request such documents, call Denise Kearns at 202-260-7798, or send e-mail to:

kearns.denise@epa.gov

2. Our website contains more CLI information. Go to:

www.epa.gov/opptintr/labeling

(and be sure to check out the "What's New" area while you're visiting!)

3. Call any of the people listed in the box below ("CLI Contacts").

CLI Contacts

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